

# CCRLS Patron Confidentiality Guidelines

The CCRLS member libraries, CCRLS, Chemeketa Community College, and the staff at all these organizations jointly hold responsibility for the appropriate use, storage and destruction of sensitive personal information. Staff members, including non-paid volunteers, at CCRLS member institutions with access to patron records are legally responsible for protecting the privacy of our patrons by using information only when necessary to circulate material, for true health or safety purposes, or to otherwise assist patrons.

CCRLS member libraries are responsible for seeing that the following procedures are followed and that staff are properly trained. These should be considered minimum safeguards and may be implemented in addition to policies and procedures of the member library.

## **Penalty for Noncompliance**

Individual staff and/or institutions may face civil liability under Oregon law for “reckless disclosure” of personally identifiable information and the Oregon Consumer Identity Theft Protection Act; and civil liability under 20 U.S.C. § 1232 Family Educational Rights and Privacy Act (FERPA) for the release of student records without the student's signed release.

All patron information in shared Library Systems should be considered confidential information. This includes patrons’ names, addresses and other identifying information, circulation records; any fines owing or paid books on hold, and any notes or comments in a patron record. When information is exported from the Library Systems to other data files or printed, it becomes confidential if the name is combined with any other personal identification information (phone, barcode, driver’s license, address, etc).

Confidential Information is not to be released to anyone including relatives (except custodial parents of minor children), friends, police officers, schools or colleges, other patrons, or prospective employers. Additionally, information may never be used for personal benefit of employees. Information may be shared when it is for safety purposes, for the legitimate use of the library, and for providing library service. This would include forwarding information to Unique Management Service, assisting in the investigation of alleged crimes, or as required by law. A subpoena or search warrant is required to release information to law enforcement. Requests and subpoenas should be referred to the CCRLS Executive Director.

Staff should follow these procedures when handling confidential information:

- Never leave a Library System workstation logged in and accessible to non-staff.
- Close a patron screen when finished with the transaction.
- Do not display the Library System screen to non-staff.
- Secure printed matter with personally identifying information as well as CDs, floppy disks, thumb drives, etc., by locking them in a filing cabinet or placing them in a locked room with limited access.
- Destroy personally identifying information when you no longer have a need for it.

- Do not remove personally identifying information from the library. This includes information on laptop computers, PDA's, phones, or other devices. Information must always be safeguarded according to FERPA and Oregon state statutes.
- Confidentiality rules apply regardless of the mode of communication; i.e., in person, telephone, e-mail.
- Additional federal regulations govern the disclosure of information in student records to any third party, including parents or custodial relatives.
- Staff should always verify the credentials of a Chemeketa College patron before disclosing any information about a College library account. Asking to see a Chemeketa ID card will enable staff at other CCRLS libraries to remain in compliance with the requirements of FERPA. Any concerns or inquiries regarding acceptable use of student information should be directed to the Director of the Chemeketa College Library or to the College Registrar.

(Adopted by PYM on 2/1/2008)

(Amended by PYM on 6/14/2017)

*Guidelines should be reviewed annually by employee.*

**I have read and understand the above policy and will follow the procedures and not divulge confidential information about patrons and their use of the library, including reference requests and information about patron reading preferences.**

Name

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Date

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